

To: File
From: John Legg
Date: March 27, 2017

John Legg
3/27/17

Subj: **R13-1147V** - Class I Administrative Update
Armstrong Hardwood Flooring Company
Beverly, Randolph County, WV
Permit Application No.: R13-1147V
Company ID: 083-00025

Discussion of Update

On March 10, 2017, Class I Administrative Update R13-1147V was received at the DAQ and assigned to the writer for review. According to the update's cover letter:

Armstrong Flooring, Inc. (Armstrong) is requesting a Class I Administrative Update to their existing permit (R13-1147U), for their facility located in Beverly, West Virginia.

Armstrong proposes to add a planer to the lumber yard scrap recovery operations that were permitted in December 2016.

The emissions from the new planer would be controlled by the same control devices as the previously permitted scrap recovery equipment (a scrap grinder, a rip saw, and two knot saws).

The emissions from the control devices (two Nederman dust collection systems) are based on air flow rate and outlet grain loading data provided by the manufacturer, which are not affected by the addition of the planer.

Therefore, there will be no increase in potential PM emission due to the planer.

Changes Made to Permit

The following changes were made to R13-1147U to arrived at updated permit R13-1147V:

- 1) The "Description of Change" on page 2 of the permit was changed to:

Description of Change:	Addition of a planer to the Yard Operations – Scrap Recovery (004-01; FUG). This equipment grouping is used for re-sizing scrap in the lumber yard and now consists of a scrap grinder, a rip saw, two knot saws and planer (added under this update).
------------------------	--

- 2) The following entry in the Emission Units table entitled “Yard Operations - Scrap Recovery” was updated to add “a planer” to the description column:

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
004-01	FUG	Yard Operations – Scrap Recovery [a scrap grinder, rip saw, two (2) knot saws and a planer]	2017	6,640 ft ² /hr	Dust Collection DC-01 & DC-02

Although “Yard Operations - Scrap Recovery” is used several times in the permit, the specific equipment in the yard operations is not listed, and therefore, no further updates/changes are needed in the permit.

West Virginia Department of Environmental Protection
~~Earl Ray Tomblin~~
Jim Justice
Governor

Division of Air Quality

~~Randy C. Huffman~~
Austin Caperton
Cabinet Secretary

Class ~~III~~ Administrative Update



R13-~~1147U~~1147V

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:
Armstrong Hardwood Flooring Company
Beverly Plant
083-00025

William F. Durham
Director

|

Issued: ~~December 27, 2016~~March 21, 2017

This permit will supersede and replace Permit R13-~~1147F~~1147U.

Facility Location: Beverly, Randolph County, West Virginia
Mailing Address: PO Box 160
Beverly, WV 26253
Facility Description: Hardwood Flooring Manufacturing
NAICS Codes: 321918
UTM Coordinates: 597.41km Easting • 4,296.88 km Northing • Zone 17
Permit Type: Class ~~HI~~ Administrative Update
~~Description of Change: Relocation of a scrap grinder, rip saw and two knot saws to be used for re-sizing scrap for use in the lumber yard. Equipment will exhaust to two new dust collection systems. Installation of a vacuum coater to replace manual spray touch up. Installation of a small (22 kW/29.5 hp) natural gas fired emergency generator for backup power supply. The generator engine is certified to meet applicable emission standards by the engine manufacturer.~~
Description of Change: Addition of a planer to the Yard Operations – Scrap Recovery (004-01; FUG). This equipment grouping is used for re-sizing scrap in the lumber yard and now consists of a scrap grinder, a rip saw, two knot saws and planer (add under this update).

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.

The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
003-01	F01	Yard Operations – Haul Roads	1990	0.86 Miles	N/A
003-02	S07	Visually Distressed Flooring Line (planer, denibber, sander, scuffer)	2012	3,620 ft ² /hr	007
003-02	S33	Visually Distressed Finishing Line - Vacuum Coater	2017	3,620 ft ² /hr	N/A
003-02A	S29	Vacuum Table	2012	3,620 ft ² /hr	N/A
003-02B	S30	Stain Coater	2012	3,620 ft ² /hr	N/A
003-02C	S31	Stain Wipe	2012	3,620 ft ² /hr	N/A
003-02D	S32	Oven	2012	3,620 ft ² /hr	N/A
003-03	S07	Visually Distressed Flooring Line (planer, sander, brushing, rework)	2014	3,620 ft ² /hr	007
004-01	N/A	Yard Operations – Lumber Kilns (steam-heated pre-dryer and 38 steam-heated lumber kilns to dry green lumber).	Various	130,000,000 Board-ft/yr	N/A
004-01	FUG	Yard Operations – Scrap Recovery (a scrap grinder, rip saw, and two (2) knot saws and a planer)	2017	6,640 ft ² /hr	Dust Collection DC-01 & DC-02
005-01	S35	Natural Gas-fired Emergency Generator	2017	22 kW (29.5 HP)	N/A
N/A	N/A	Edge Coaters, parts washers, welding operations, and other activities	Various	N/A	N/A
Control Devices					
N/A	S08	Dry Electrostatic Precipitator (Services No. 1 & No. 2 Boilers)	2003	9.6 KW	008
N/A	S03	No. 1 Baghouse (Services No. 1 and No. 2 Finish Line Sanders)	1993	79,556 ACFM	003
N/A	S04	No. 2 Baghouse (Services No. 2, No. 5 Flooring Mill Lines & Flooring Mill Rough End)	1990	49,701 ACFM	004
N/A	S05	No. 3 Baghouse (Services No. 2 Wood Hog and No. 5 Wood Hog (No. 4 Cyclone), Services No. 5 & No. 6 Flooring Mill Lines)	1990	57,077 ACFM	005
N/A	S06	No. 4 Baghouse (Services No. 3 Wood Hog (No. 3 Cyclone))	1990	27,489 ACFM	006
N/A	S07	No. 5 Baghouse (No. 3 Flooring Mill Line & Visually Distressed Flooring Line)	2003	43,295 ACFM	007
N/A	S09	No. 6 Baghouse (Services No. 4 Wood Hog (No. 1 Cyclone), No. 1 Wood Hog (No. 5 Cyclone) & Main Relay Line (No. 6 Cyclone))	2005	59,748 ACFM	009

2.3. Authority

This permit is issued in accordance with West Virginia air pollution control law W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supersedes and replaces previously issued Permit R13-~~1147F~~1147U. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Applications R13-1147 through R13-~~1147U~~1147V, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.